

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
)	
DANE HARRINGTON YOUNG,)	
Petitioner,)	
)	
v.)	CIVIL NO. 05-10050-DPW
)	
UNITED STATES OF AMERICA,)	
Respondent.)	
_____)	

RESPONDENT'S MOTION FOR EXTENSION OF TIME

The United States, by and through the undersigned attorneys, hereby respectfully moves this Honorable Court for a sixty-day enlargement of time (*i.e.*, until June 3, 2005) to file a response to the Petitioner's Motion to Vacate and Correct Sentence Pursuant to 28 U.S.C. §2255.

In support of this motion, the government states as follows:

1. Petitioner's §2255 motion concerns a criminal matter that was prosecuted by former Assistant United States Attorney Dickens Mathieu.
2. On April 1, 2005, this matter was assigned to the undersigned Assistant United States Attorney ("AUSA"), whose Notice of Appearance as substitute counsel for former AUSA Mathieu is filed herewith. The undersigned AUSA received a copy of Petitioner's §2255 motion and the Court's Order regarding Petitioner's §2255 motion on April 1, 2005.
3. The undersigned AUSA, however, is not previously familiar with the Petitioner's criminal case, and respectfully requests an additional 60 days to (i) retrieve the government's case file from archives, (ii) review the case file, and (iii) prepare an appropriate response to Petitioner's §2255 motion.

WHEREFORE, the government respectfully moves this Honorable Court for an enlargement of time until June 3, 2005, to file a response to the Petitioner's Motion to Vacate and Correct Sentence Pursuant to 28 U.S.C. §2255.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

April 4, 2005

By: /s/ Lisa M. Asiaf
LISA M. ASIAF
Assistant U.S. Attorney
Tel: (617) 748-3268

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery to *Pro Se* Petitioner, Dane Harrington Young, Prisoner No. 24661-038, McRae Correctional Facility, 100 A Jim Hammock Drive, McRae, GA 31055.

This 4th day of April 2005.

/s/ Lisa M. Asiaf

LISA M. ASIAF
ASSISTANT UNITED STATES ATTORNEY